

REMARKS

Needed formal changes are made throughout the specification.

New claims 19 and 20 are added, directed to a preferred embodiment.

Claims 1-18 are maintained intact, as it is believed that they already define invention over the applied reference.

Reconsideration is accordingly respectfully requested, for the rejection of most of the claims as anticipated by or unpatentable over COTTON 6,655,654.

Referring to Figure 14B of COTTON (as does the Official Action), we see a piezoelectric element 419 which is compressed from below by member 454 and from above by the member 440.

Notice, however, that 440 contacts only the outer rim of 419. Thus, whatever stress is induced in 419, by the joint action of 454 and 440, is distributed throughout the entire volume of 419 and not locally.

This is in principle similar to U.S. Patent 6,274,917, described in our specification beginning in line 13 on page 1 thereof. Thus, we have already distinguished the present invention from the known prior art, which, according to our specification, is typified by 6,274,967, but could well and equally be typified by COTTON et al. 6,655,754, because the same principle is to be found in both references, namely, that stress is induced over the entire volume of the piezoelectric layer.

Continuing in our specification thereafter, the disadvantages of such an arrangement are recited, particularly on page 3, lines 8-13 of our specification.

By contrast, the present invention provides a very large relative displacement in comparison with the known prior art, by means first recited in our specification beginning in page 3, line 17 thereof. Specifically, we stress only a partial volume, not the entire volume of the piezoelectric layer. In a preferred application, we stress a plurality of partial volumes distributed in spaced apart relationship about the piezoelectric layer.

We bring out this relationship in claim 1, by reciting that the volume into which the force is introduced, is a partial volume of the piezoelectric layer.

In claims 2, 3 and 9, we point out that there are plural such volumes created, which of course is totally impossible to the devices of the prior art.

In new claims 19 and 20, we point out (claim 19) that the force is applied to opposite surfaces of the piezoelectric element in areas smaller than the surface areas, and that (claim 20) there are a plurality of such smaller surfaces distributed about both surfaces of the piezoelectric element.

In view of the present amendment and the foregoing Remarks, therefore, it is believed that this application has been

placed in condition for allowance, and reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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